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11 U.S. Bank National Association

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 JACYL D. TACANG,

15 Plaintiff,

16 v.

17 U.S. BANK HOME MORTGAGE,

18 Defendant.

Case No.: 2:18-cv-01431-JCM-CWH

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT U.S.
BANK NATIONAL ASSOCIATION TO
ANSWER OR RESPOND TO
PLAINTIFF'S COMPLAINT**

(First Request)

Current Due Date: August 30, 2018

New Due Date: October 1, 2018

19 Defendant U.S. Bank National Association (sued herein as "U.S. Bank Home Mortgage")
20 ("U.S. Bank") and plaintiff Jacyl D. Tacang ("Plaintiff") by and through her counsel of record,
21 hereby stipulate and agree as follows:

RECITALS

22 **WHEREAS** on August 2, 2018, Plaintiff filed her Complaint in this action with this Court;

23 **WHEREAS** on August 9, 2018, Plaintiff caused the Complaint to be served on U.S. Bank;

24 **WHEREAS**, U.S. Bank's current deadline to respond to Plaintiffs' Complaint is August 30,
25 2018;

26 **WHEREAS**, Plaintiff and U.S. Bank are currently engaged in early settlement discussions
27 which may resolve this matter;
28

WHEREAS, U.S. Bank has not requested nor obtained any prior extensions to respond to Plaintiff's Complaint;

WHEREAS, pursuant to LR IA 6-1(a) and LR II 7-1, Plaintiff and U.S. Bank have agreed to extend U.S. Bank's deadline to respond to the Complaint for a period not greater than thirty days, from August 30, 2018, to October 1, 2018.

**IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN THE PARTIES
AS FOLLOWS:**

U.S. Bank's deadline to respond to the Complaint is extended to October 1, 2018.

IT IS SO STIPULATED.

DATED: August 17, 2018

HAINES & KRIEGER, LLC

By: /s/ Shawn M. Miller
David H. Krieger (SBN 9086)
Shawn W. Miller (SBN: 7825)
8985 S. Eastern Ave., Suite 350
Henderson, NV 89123
Attorneys for Plaintiff JACYL D. TACANG

DATED: August 17, 2018

DUANE MORRIS LLP

By: /s/ Holly S. Stoberski, Esq.
 Dominica C. Anderson (SBN 2988)
 Holly S. Stoberski (SBN 5490)
Attorneys for Defendant U.S. BANK
NATIONAL ASSOCIATION

[PROPOSED] ORDER

Good cause appearing, the deadline for defendant U.S. Bank to respond to the Complaint of plaintiff Jacyl D. Tacang is extended to October 1, 2018.

IT IS SO ORDERED.

Dated: August 20, 2018

UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 1. On August 17, 2018, I served the following document(s):

3 **STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANT U.S. BANK**
4 **NATIONAL ASSOCIATION TO ANSWER OR RESPOND TO PLAINTIFF'S**
COMPLAINT (FIRST REQUEST)

5 2. I served the above-named document by the following means to the persons listed below:

6 ☒ BY electronic transmission through the CM/EFC filing system of the United States
7 District Court, District of Nevada.

8 David H. Krieger
9 Shawn W. Miller
10 HAINES & KRIEGER, LLC
11 8985 S. Eastern Ave., Suite 350
12 Henderson, NV 89123
13 *Attorneys for Plaintiff Jacyl D. Tacang*
14 Email: dkrieger@hainesandkrieger.com

15 ☐ BY Mail: I am "readily familiar" with the firm's practice of collection and
16 processing correspondence for mailing and electronic service. Under that practice it
17 would be deposited with the U.S. postal service on that same day with postage
18 thereon fully prepaid at Las Vegas, Nevada, in the ordinary course of business, and
19 also served via electronic mail.

20 3. I declare under penalty of perjury that the foregoing is true and correct.

21 SIGNED: August 17, 2018

22 Janice R. Reeder
23 (Name of Declarant)

24 /s/ Janice R. Reeder
25 (Signature of Declarant)